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12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 TANISE HILL,

15 CASE NO.:

16 Plaintiff,

17 **DEFENDANTS' NOTICE OF
18 REMOVAL PURSUANT TO 28 U.S.
19 CODE § 1446**

20 vs.

21 LEUL ABRAHAM TEKLE; MERON
22 ENTERPRISES, INC., a Texas Corporation;
23 DOE INDIVIDUALS 1-20, inclusive; and
24 ROE ENTITIES 1-20, inclusive,

25 Defendants.

26 Defendants, LEUL ABRAHAM TEKLE ("Tekle") and MERON ENTERPRISES, INC.
27 ("MERON") (collectively "Defendants"), by and through their counsel of record, Melissa J.
28 Roose, Esq. and Joshua Y. Ang, Esq., of the law offices of RESNICK & LOUIS, P.C., hereby
give notice of removal of this action to the United States District Court for the District of
Nevada from the Nevada Eighth Judicial District Court in and for Clark County. This Notice
of Removal is signed pursuant to Fed. R. Civ. P. 11.

29 In support of this Notice of Removal, Defendants state and allege as follows:

30 1. This Court has original jurisdiction over the subject matter of this action under the
31 provisions of 28 U.S.C. §1332 in that there is complete diversity between the parties
32 and more than \$75,000 in controversy, exclusive of interests and costs.

2. Meron is a defendant in the above-entitled action now pending in the Eighth Judicial District, Clark County, Nevada, Case No. A-20-821459-C. Meron is a Texas Corporation with its principal place of business in that state.
3. Tekle is a defendant in the above-entitled action now pending in the Eighth Judicial District, Clark County, Nevada, Case No. A-20-821459-C. Upon information and belief, Tekle is a citizen of the State of South Dakota.
4. Plaintiff, Tanise Hill, is a citizen of the State of Nevada.
5. With respect to the amount in controversy, Plaintiff asserts total medical specials of \$258,702 (inclusive to which is the surgical cost estimate recommendation of Jason E. Garber, MD, FAANS, FACS for an artificial disc replacement at C5-C6 levels) in addition to other categories of damages such as pain and suffering. *See Exhibit A*, Declaration of Counsel. Thus, the amount in controversy exceeds \$75,000, and this Court has jurisdiction to entertain this matter based on diversity jurisdiction.
6. The Notice of Removal is timely pursuant to 28 U.S.C. § 1446(b)(3) as it is being filed less than one (1) year from the date Plaintiff filed her Complaint on September 18, 2020 and within thirty (30) days of defense counsel's confirmation on or about March 2, 2021 that Plaintiff's alleged medical specials total \$258,702.
7. Copies of Plaintiff's Initial Appearance Fee Disclosure, Complaint and Affidavits Of Service/Of Compliance are attached hereto as **Exhibit B**. This constitutes all of the papers and pleadings served on Defendants.
8. Copies of Defendants' Initial Appearance Fee Disclosures, Answer, NRCP 7.1 Disclosure Statement and Jury Demand are attached hereto as **Exhibit C**. This constitutes all of the papers and pleadings filed by Defendants.
9. Defendants have concurrently filed a copy of this Notice of Removal with the Clark County District Court Clerk and have served a copy of this document upon Plaintiff.

Based upon the foregoing, Defendants hereby remove the above action now pending in the Eighth Judicial District, Clark County, Nevada, Case No. A-20-821459-C, to this Court.

DATED this 4th day of March, 2021.

RESNICK & LOUIS, P.C.

/s/ Melissa J. Roose
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CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and the Court's Local Rules, the undersigned hereby certified that on this day, March 4, 2021, a copy of the foregoing document was served upon all parties and counsel of record through the Court's CM/ECF system.

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/s/ Jennifer L. Meacham
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